

FREEMAN, NOOTER & GINSBERG
ATTORNEYS AT LAW

LOUIS M. FREEMAN
THOMAS H. NOOTER*
LEE A. GINSBERG

75 MAIDEN LANE
SUITE 503
NEW YORK, N.Y. 10038

NADJIA LIMANI
OF COUNSEL

(212) 608-0808
TELECOPIER (212) 962-9696

CHARLENE RAMOS
OFFICE MANAGER

January 7, 2020

Hon. P. Kevin Castel
U.S. District Judge
U.S. Courthouse
500 Pearl Street
New York, NY 10007

moving voluntarily

Re: U.S. v. Terry Former
19 CR 781 (PKC)

Dear Judge Castel:

We write to request permission for Mr. Former appear telephonically for the January 13, 2020 status conference in the above case. The government through AUSA Tara LaMorte takes no position on this application.

Balancing the equities favor having Mr. Former appear by phone. He lives in Texas; he signed a financial affidavit swearing to his indigency which was approved by the magistrate; and he was arraigned on the indictment before the magistrate. The agenda at the conference which was approved by the magistrate will likely involve setting a date for discovery production and for the parties to come back to court to state whether the government produced discovery and whether the defendants had sufficient time to review it. Thus, we expect the status conference to be procedural in nature. Finally having a defendant appear by phone saves the government the cost of paying for the defendant's transportation and overnight accommodations.

Accordingly, we request permission for Mr. Former to appear telephonically for the January 13, 2020 status conference.

Respectfully submitted,

/S/ Louis M. Freeman
Louis M. Freeman

The notion that the scope of any conference is necessarily limited to discrete scheduled issues is somewhat overstated. The Court has required. Former's co-defendant is free to appear from his own choice. Applicant GRANTED. 1-7-20